

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

PROMED, LLC,**Plaintiff,****- vs -****QUINTAIROS PRIETO WOOD & BOYER
PA,****Defendant.**

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CIVIL ACTION 3:23-CV-2023-D

PLAINTIFF PROMED, LLC'S TRIAL EXHIBIT LIST

Pursuant to the Court's Trial Setting Order [Doc. No. 9] and the Local Rules, Plaintiff ProMed, LLC ("Plaintiff" or "ProMed") files this, its Trial Exhibit List and would respectfully show unto the Court as follows:

EXHIBIT LIST

Plaintiff reserves the right to utilize and/or offer the following exhibits at the time of trial.

Ex. No.	DESCRIPTION	AGREED / OBJECTED	IDENTIFIED	OFFERED	ADMITTED
1.	Irrevocable Corporate Purchase Agreement (June 17, 2020) [ProMED, LLC 000015 – 29]				
2.	Escrow Agreement (July 16, 2020) [ProMED, LLC 000218-221]				
3.	Deposition Transcript of Alan Brenner (March 15, 2023) [ProMED, LLC 000297 – 507]				
4.	Assignment of Claim from Luxe to ProMED (June 7, 2023) [ProMED, LLC 000030 – 34]				
5.	Escrow Account Activity Between July 28, 2020 and April 7, 2021 [QPWB 000049-50]				

6.	Email Re Wire Transfer (August 3, 2020) [QPWB 000072-80]				
7.	Emails between ProVantage and QPWB Authorizing July 31, 2020 Transfer [QPWB 000005-13]				
8.	Emails Between ProVantage and QPWB Authorizing August 19, 2020 Transfer [QPWB 000043-48]				
9.	Emails between ProVantage and QPWB Authorizing and Confirming August 31, 2020 Transfer [QPWB 000014-18]				
10.	Email from Counsel for Luxe to QPWB (July 22, 2020) [QPWB 000051-52]				
11.	Email from Counsel for Luxe to QPWB (October 7, 2020) [QPWB 000081-82]				
12.	Email from Counsel for Luxe to QPWB (January 11, 2021) [QPWB 000020-21]				
13.	Letter from QPWB to Counsel for Luxe (March 5, 2021) [QPWB 000094]				
14.	Purchase Agreement for 125,000 Boxes (July 20, 2020) [ProMED, LLC 00001-07]				
15.	Purchase Agreement for 200,000 Boxes (July 20, 2020) [ProMED, LLC 00008-14]				
16.	Luxe Development Account Information for August 3, 2020 through August 31, 2020 [ProMED, LLC 000194-205]				
17.	Luxe Development Account Information for July 1, 2020 through July 31, 2020 [ProMED, LLC 000206-15]				
18.	Luxe Development Account Information for June 1, 2020 through June 30, 2020 [ProMED, LLC 000243-252]				
19.	Email from Counsel for Luxe to QPWB (November 10, 2020) [ProMED, LLC 000223-25]				
20.	Outgoing Wiring Detail (June 18, 2020) [ProMED, LLC 000268]				

21.	QPWB Letter of Representation of Charlene Russo (July 1, 2020) [ProMED, LLC 000272-273]				
22.	Payment Details Report (July 31, 2020) [ProMED, LLC 000495]				
23.	Payment Details Report (August 19, 2020) [ProMED, LLC 000501]				
24.	Payment Details Report (August 31, 2020) [ProMED, LLC 000504]				
25.	Payment Details Report (April 7, 2021) [ProMED, LLC 000507]				
26.	Executed Purchase Agreement				
27.	QPWB Invoice Re: Paymaster Services (August 10, 2020) [QPWB 00065-66]				
28.	Email from Charlene Russo to Eric Boyer with SPA (October 29, 2020) [QPWB00070-71]				
29.	QPWB Email re Transaction Recap (January 18, 2024)				
30.	Transaction Recap.xlsx (January 18, 2024)				
31.	Email from Eric Boyer to Alan Brenner and Charlene Russo (April 6, 2021)				
32.	Email from ProMED Counsel to QPWB Counsel Re Use of Allen Brenner Deposition Transcript (April 23-May 3, 2024)				
33.	Purchase Agreement executed by Charlene Russo [ProMED, LLC 000478-484]				
34.	Email Chain between Chad Walker, Charlene Russo, Michelle Reulet, Yvonne Renfrow, and Blake Moorman, Dated: July 14, 2020 [ProMED, LLC 000295-96]				
35.	Email from Hamilton Rucker to Alan Brenner, Dated: July 22, 2020 [ProMED, LLC 000216-17]				

36.	Email Exchange between Charlene Russo and Michelle Reulet, Dated: July 27-28, 2020 [ProMED, LLC 000190-93]				
37.	Luxe Development Funds History and Trust Detail Matter, Prepared by Defendant [ProMED, LLC 000485]				
38.	Email Exchange between Alan Brenner, Charlene Russo, Sean Heileman, Peter Molinelli, and Eric Boyer, Dated: July 31, 2020 [ProMED, LLC 000487-495]				
39.	Email Exchange between Alan Brenner and Charlene Russo, regarding Wire Request [ProMED, LLC 000496-501]				
40.	Email Exchange between Alan Brenner and Charlene Russo, Dated: August 31, 2020 [ProMED, LLC 000502-506]				
41.	Email Exchanged between Alan Brenner and Charlene Russo, Dated: August 31, 2020 [ProMED, LLC 000286-287]				
42.	Advanced Healthcare Solutions, LLC's Standard Operating Procedures [ProMED, LLC 000288]				
43.	Purchase Orders regarding ProMED [ProMED, LLC 000289-291]				
44.	Bill of Lading [ProMED, LLC 000292]				
45.	Airway Bill from ProVantage to Luxe [ProMED, LLC 000293]				
46.	Deposition of Michelle Reulet, Dated: October 25, 2022 [ProMED, LLC 00035-296]				
47.	Email from Alan Brenner to Hamilton Rucker with embedded attachments [QPWB00067]				
48.	Email Correspondences between Hamilton Rucker, Sean Heileman, Charlene Russo, John Crouch, Michelle Reulet, Araceli Castillo Garcia, Alan Brenner, Eric Boyer, and Peter Molinelli regarding Luxe's Notice				

	and Demand, Dated: October 7-8, 2020 [QPWB00068-69]				
49.	Email Exchange Between Charlene Russo, Eric Boyer, Peter Molinelli, and Alan Brenner, Dated: October 29, 2020 [QPWB00070-71]				
50.	Medical Equipment Quotation [QPWB0001-004]				
51.	Email Communications between Hamilton Rucker, Arthur C. Neiworth, Eric Boyer, and Charlene Russo, Dated: February 26, 2021 to March 1, 2021				
52.	Email Communications between Hamilton Rucker, Alan Brenner, and Araceli Castillo Garcia, Dated: July 22, 2020-September 10, 2020				
53.	QPWBlaw.com Screenshots				

Plaintiff incorporates herein by reference any and all exhibits listed or designated by Defendant in this matter. Plaintiff respectfully reserves the right to utilize, at the time of trial of this case, any and all exhibits designated or listed by Defendant, and the right to use demonstrative aids.

Respectfully Submitted,

DYKEMA GOSSETT PLLC

By: /s/ Maria L. McIntyre

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ATTORNEYS FOR PLAINTIFF PROMED, LLC

CERTIFICATE OF SERVICE

I certify that the foregoing document has been served on all parties via the Court's CM/ECF system in accordance with the Federal Rules of Civil Procedure on March 10, 2025.

/s/ Maria L. McIntyre
Maria L. McIntyre